

**REMARKS**

**Summary of Office Action**

Claims 1-4, 6, 9, 11, 12, 15, 16, 18 and 19 stand rejected under §103(a) as allegedly being unpatentable over Lee et al. (US 6,295,105).

Claims 5, 10, and 17 stand rejected under §103(a) as allegedly being unpatentable over Lee et al. in view of Shiotani et al. (JP 2001-338512).

Claims 7 and 13 stand rejected under §103(a) as allegedly being unpatentable over Lee et al. in view of Nakano (US 2003/0053008).

Claims 8, 14, and 20 stand rejected under §103(a) as allegedly being unpatentable over Lee et al. in view of Matsuda et al. (US 2002/0167626).

**Summary of Amendment**

Claims 1, 11, 18, and 20 have been amended. In particular, independent claims 1, 11, and 18 have been amended to incorporate features of their dependent claims 3, 16, and 20, respectively. Accordingly, claims 3 and 16 have been canceled and claim 20 has been amended to remove the feature incorporated into its base claim 18. Therefore, no new matter has been entered. Claims 1, 2, 4-15, 17-20 are pending for consideration.

**All Claims Comply With §102 and §103**

Claims 1-4, 6, 9, 11, 12, 15, 16, 18, and 19 stand rejected under §103(a) as allegedly being unpatentable over Lee et al. Claims 5, 10, and 17 stand rejected under §103(a) as allegedly being unpatentable over Lee et al. in view of Shiotani et al. Claims 7 and 13 stand rejected under §103(a) as allegedly being unpatentable over Lee et al. in view of Nakano. Claims 8, 14, and 20

stand rejected under §103(a) as allegedly being unpatentable over Lee et al. in view of Matsuda et al. Applicant respectfully traverses these rejections.

First of all, an object of the present invention is to provide a liquid crystal display device preventing light leakage without making a fabrication process complicated by a lamp cover enclosing a lamp with a reflection sheet, overlapping the reflection sheet with a light guide plate, and a bottom cover supporting the reflection sheet. To this end, the reflection sheet of the present invention encloses most portions of the fluorescent lamp except for a light exit portion and may be affixed to both sides of the light guide plate. Accordingly, the reflection sheet may be affixed to both sides of the light guide plate to overlap with a portion of the light guide plate to prevent deformation of the reflection sheet. Moreover, the bottom cover of the present invention may have a shape similar to a shape of the reflection sheet to prevent deformation of the reflection sheet while supporting and affixing the reflection sheet. Accordingly, light leakage may be prevented from occurring within a gap between the reflection sheet and the optical sheets or between the reflection sheet and the reflection plate.

As amended, independent claim 1 recites, in part, “a bottom cover having an end portion that is in contact with opposing sides of the reflection sheet to substantially surround and encase the reflection sheet and to support and affix the reflection sheet, the reflection sheet enclosing an outer side of the florescent lamp except for a light exit portion of the fluorescent lamp and overlapping a portion of the light guide plate.” As amended, independent claim 11 recites, in part, “a bottom cover extending from a rear side of the reflection plate to an outer side of the reflection sheet such that an end portion of the bottom cover extends to the outer side of the

reflection sheet and is in contact with opposing sides of the reflection sheet to substantially surround and encase the reflection sheet and to support and affix the reflection sheet, the reflection sheet enclosing an outer side of the fluorescent lamp except for a light exit portion of the fluorescent lamp and overlapping a portion of the light guide plate." As amended, independent claim 18 recites, in part, "a bottom cover along a rear side of the reflection plate having an end portion that is in contact with opposing sides of the reflection sheet to substantially surround and encase the reflection sheet and to support and affix the reflection sheet, the reflection sheet enclosing an outer side of the fluorescent lamp except for a light exit portion of the fluorescent lamp and overlapping a portion of the light guide plate." Applicant respectfully asserts and the Office acknowledges that Lee et al. fails to teach or suggest at least such a feature because, as shown below, Lee et al. teaches includes a mold frame (126, 132) inserted between the back cover (128, 138) and the lamp cover 124.

FIG. 2

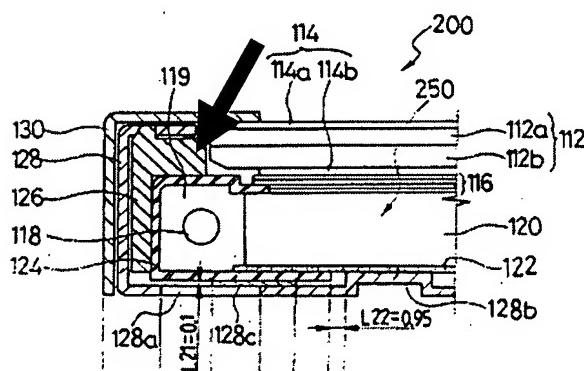
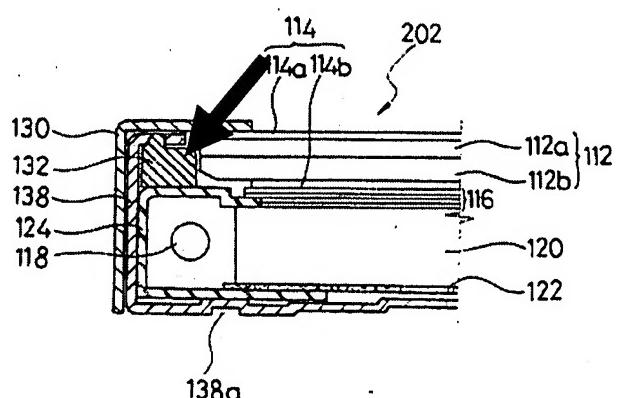


FIG. 9



In order to overcome this deficiency, the Office alleges that it would have been obvious to one of ordinary skill in the art "to form parts integral such that the mold frame 132, which is attached to

the bottom cover 138, are made as a single piece, thus, the bottom cover would contact with opposing sides of the reflection sheet as shown in Figure 9" citing to MPEP 2144.04. The Office's allegation is essentially that it would have been obvious to one of ordinary skill in the art to have formed the back cover 138 with an end portion in the shape of the mold frame 132 such that the back cover 138 is integral with the mold frame 132. Applicant disagrees.

First, the figure shown (e.g., FIG. 9) is only a cross sectional view. There is no description of what the mold frame 132 actually looks like. Accordingly, it is not clear whether it is even possible to form the mold frame 132 integral with the bottom cover 138. Mere possibility is not a basis for obviousness without some evidence that it can be done. (See MPEP 2143.01(III)).

Second, even if, *in arguendo*, the bottom cover 138 can be made integral with mold frame 132, Applicant submits it would not have been obvious for one with ordinary skill in the art to do so because Lee et al. teaches away from such a structure. The invention of Lee et al. is to address the problem of delayed luminance saturation and loss of luminance due to heat loss. (Lee: Col. 1, ll. 43-45.) In order to reduce heat loss, Lee et al. teaches a back cover 138 formed to *minimize* the size of *the contact area* between the *lamp cover* 124 (which, in this case, has been construed as the "reflective sheet") and the *back cover* 138. (Lee: Col. 5, ll. 58-59.) Hence, the obviousness argument presented by the Office (i.e., increasing contact between the back cover 138 and reflective lamp cover 124) is *directly contrary* to the teaching of Lee et al. (i.e., minimizing contact between back cover 138 and reflective lamp cover 124). Therefore, Applicant respectfully submits that it would not have been obvious to form the mold frame 132

integral with the back cover 138 as proffered in the rejection. As the rejection fails to present a prima facie case of obviousness, Applicant respectfully requests that the §103 rejection of independent claims 1, 11, and 18 be withdrawn.

Claims 2, 4, 6, 9, 12, 15, and 19 depend from the corresponding one of base claims 1, 11, and 18, thereby incorporating all the claim features of the respective one of base claims 1, 11, and 18. Accordingly, dependent claims 2, 4, 6, 9, 12, 15, and 19 are allowable over Lee et al. for at least the reasons stated above.

Likewise, claims 5, 7, 8, 10, 13, 14, 17, and 20 also depend from the corresponding one of base claims 1, 11, and 18, thereby incorporating all the claim features of the respective one of base claims 1, 11, and 18. Moreover, Shiotani et al., Nakano, and Matsuda et al. all fail to cure the deficiencies of Lee et al. described above. Accordingly, Lee et al., Shiotani et al., Nakano, and Matsuda et al., whether taken individually or in combination, fail to teach or suggest all the features of dependent claims 5, 7, 8, 10, 13, 14, 17, and 20 for at least the reasons explained above. Accordingly, dependent claims 5, 7, 8, 10, 13, 14, 17, and 20 are allowable over Lee et al., Shiotani et al., Nakano, and Matsuda et al. for at least the reasons stated above.

# # # # #

**CONCLUSION**

In view of the foregoing, reconsideration and timely allowance of the pending claims are respectfully requested. Should the Examiner feel that there are any issues outstanding after consideration of the response, the Examiner is invited to contact the Applicant's undersigned representative to expedite prosecution.

If there are any other fees due in connection with the filing of this response, please charge the fees to our Deposit Account No. 50-0310. If a fee is required for an extension of time under 37 C.F.R. 1.136 not accounted for above, such an extension is requested and the fee should also be charged to our Deposit Account.

Respectfully submitted,

**MORGAN, LEWIS & BOCKIUS LLP**

By:   
Kyle J. Choi  
Reg. No. 41,480

Dated: August 30, 2007

MORGAN, LEWIS & BOCKIUS LLP  
**Customer No.: 009626**  
1111 Pennsylvania Avenue, N.W.  
Washington, D.C. 20004  
Telephone: 202.739.3000  
Facsimile: 202.739.3001